Subject: Islander East Comments
Resent-From: Islandereast.Comments@noaa.gov
Date: Fri, 14 Nov 2003 12:06:00 -0500
From: jgordes <jgordes@earthlink.net>
To: IslanderEast.comments@noaa.gov

Whom It May Concern:

Please enter the letter below of 12/19/02 into the official record concerning the Islander East Pipeline as well as the attached testimony from another docket which has some pertinence to this issue as well.

Best,
Joel N Gordes

The Honorable Donald Evans
Secretary of Commerce

Dear Mr Secretary,

The overly ostentatious half-page advertisement by Islander East in today's Hartford Courant prompts me to write to you. While most of the opposition to the Islander East project centers on environmental grounds, I want to alert you to my opposition on energy security grounds.

1) First, I have no official affiliation with any energy company or other group although I am privy to some environmental lists-serves. I do not live anywhere near this proposed line so it is not a NIMBY issue for me.

2) I DO have a military background which is what prompts me to think in these terms and while 9/11 was "supposed to change we all think," I see little if any change in thought by any of the utility industries or by their regulators. Further electric grid centralization into Regional Transmission Organizations, that make us even more vulnerable, by the FERC is a step in the wrong direction in my humble opinion.

3) I have been in the energy field for 27 years holding a variety of positions that are more than detailed in the CV which is the back of my attached testimony.

4) I have been a huge fan of gas-fired combined cycle gas turbines (CCGT) and aeroderivative gas turbines for their efficiency, environmental characteristics and employment opportunities they offer to Connecticut industry.

5) I also, however, work on energy security issues and what is planned I see as a direct threat to our energy security and I have a good deal of support from a number of federal and other officials.

All this being said, I have great concerns about this pipeline in relation to energy security. 1) No fuel should make up 60% or more of our electric generation mix in Connecticut as predicted y the Connecticut Siting Council even if the sources are somewhat diversified via multiple pipelines. Redundancy within a still-centralized system is no defense and I point to a recent National Academies study to emphasize this point. 2) Not only are pipelines great targets for physical attacks BUT even more prone to insidious cyberattacks against command, control, information and compressor structures. That could play havoc with the system AND potentially prove deadly to a great number of people.

For instance, even with new pipeline, the appetite for gas by CCGTs is huge. If we had an "event" as we did in December 1989 of sustained 14

degree below-zero temperatures for more than 10 days [when gas companies twice took out full page ads to ask customers to curtail use in Connecticut] AND concurrently a terrorist were to take out a line or two or use a cyberattack to disrupt operations, there might be some nasty choices between gas for home heating and gas for electricity. While Connecticut plants also have on-site oil for a few days, a well-executed cyberattack could extend for a longer period than such oil supplies would last. Since more and more residential gas heating units use electronic ignition rather than pilot lights, this becomes even more problematic. Unlike the FBI and CIA, such scenarios as this DO "connect the dots."

Anyhow, I have attached my testimony from the Connecticut docket on transmission and pipelines for you and while most of it centers on electric transmission line vulnerability, much of the same is essentially true for natural gas pipelines as they are now configured. Unlike electricity, though, natural gas can be made to explode adding a new dimension to any attack.

I have alerted officials at Islander East to my concerns but with no reply which has prompted me to chastise them as putting "job security over national security." I hope your Department is more astute than the FBI and the CIA in their ability to "connect the dots" in this respect .

Sincerely,
Joel N. Gordes

Enironmental Energy Solutions
P.O. Box 101
Riverton, CT 06065
(860) 379-2430

"Dedicated to executing ideas not killing them!"

Be sure to visit our web site at:
http://home.earthlink.net/~jgordes

Docket #02-04-23 Transmission [Gordes].doc	**Name:** Docket #02-04-23 Transmission [Gordes].doc **Type:** WINWORD File (application/msword) **Encoding:** base64 **Download Status:** Not downloaded with message

Subject: **Pipeline**
Resent-From: Islandereast.Comments@noaa.gov
Date: Wed, 19 Nov 2003 10:44:30 EST
From: Hssnapshot@aol.com
To: IslanderEast.comments@noaa.gov

I am opposed to the Islander East Pipeline project because of the extensive negative environmental, economic and safety impacts. I urge you to uphold the October 2002 and July 2003 decisions by the CT Department of Environmental Protection which denied Islander East a "coastal consistency" determination under CT's federally-approved Coastal Zone Management Program.
PLEASE SUPPORT OUR CT DEP AND DENY ISLAND EAST'S APPEAL. Thank you.

Harold F. Mangler
98 Short Beach Rd.
Branford CT 06405-4428

Subject: **STOP THE PIPELINE NOW!!!!!!!!!!!!**
Resent-From: Islandereast.Comments@noaa.gov
Date: Wed, 19 Nov 2003 16:20:41 +0000
From: E.J.P-11@att.net
To: IslanderEast.comments@noaa.gov

To whom it may concern; I Edward J. Palma am vehemently opposed to the Islander East Pipeline Project. The project will create extensive negative impact on the ecostructure of the Long Island Sound and its shore lines. The permanent environmental damage that will be done will be irreparable. It will also create a major negative impact on our state and local economy,while jeopardizing the future of our local Shellfishing and Fishing Industries. How can we allow Duke Energy, a corporation that wantonly and knowingly disregards major environmental laws (ie. Clean Air and Clean Water Acts), and pollutes the Earth without any conscience, to proceed with this project. Please uphold the October 2002 and the July 2003 decisions by the Connecticut Department of Environmental Protection, which denied Islander East a " coastal consistency determination under Connecticut's federally approved Coastal Zone Management Program. Please support the Connecticut Department of Environmental Protection and reject the appeal by Islander East.

Thank you very much for your time;
Edward J. Palma
60 Midwood Road
Branford, Connecticut 06405
e-mail (E.J.P-11@att.net or SUNBUILDERS@att.net)

Subject: **Town of Branford, CT's Oppostion to IE coastal consistency appeal from CT-DEP**
Resent-From: Islandereast.Comments@noaa.gov
Date: Wed, 19 Nov 2003 13:01:01 -0500
From: "EP Gilson" <egilson@snet.net>
Organization: Elizabeth P Gilson Att. At Law
To: <IslanderEast.comments@noaa.gov>

Please see attached opposition to the coastal consistency appeal of Islander East Pipeline Company prepared by the Town of Branford, CT.
Please add this letter to other comments regarding this appeal.
Very truly yours, Elizabeth P. Gilson, special counsel, Town of Branford

NOAA.rtf	**Name:** NOAA.rtf **Type:** WINWORD File (application/msword) **Encoding:** quoted-printable **Download Status:** Not downloaded with message

ELIZABETH P. GILSON ATTORNEY AT LAW

383 Orange Street
New Haven, CT 06511
Tel: 203.777.4050
Fax: 203.787.3259
egilson@snet.net

November 19, 2003

United States Department of Commerce
National Oceanic and Atmospheric Administration

IN THE MATTER OF THE COASTAL
CONSISTENCY APPEAL OF THE ISLANDER EAST PIPELINE COMPANY

Attn: Office of the General Counsel

This letter is submitted on behalf of the Town of Branford, Connecticut, in support of the position taken by the State of Connecticut Department of Environmental Protection, that Islander East's consistency appeal should be dismissed on the merits, because the proposed project is neither consistent with the objectives or purposes of the CZMA nor necessary in the interests of national security. In further support, the Town of Branford states:

General comments:

The Town of Branford, Connecticut reviewed the DEIS, and compared its conclusions with those reached by the Branford Blue Ribbon Commission in its report prepared in November submitted to the FERC in January, 2002. The Blue Ribbon Report criticized Islander East's ("IE") application as lacking sufficient information for the Blue Ribbon Commission or any other regulatory agency to make an informed decision about the environmental compatibility of the proposed route. The Blue Ribbon Commission found that the details of the proposed construction project were woefully lacking, particularly for wetlands crossings, the proposed horizontal directional drilling ("HDD"), and the effects on the environment caused by the offshore construction activities. Unfortunately, the shortcomings in the application apparently inhibited the production of a comprehensive DEIS evaluation. Branford has prepared the following comments:

UPLAND CONSTRUCTION:

The DEIS assumes, incorrectly, that there is a difference between a "temporary disturbance and a long-term disturbance in a wetland system.

Of the 43 wetlands crossings made by the Islander East project, 40 will be within Connecticut, disrupting more than 30 acres. Approximately half of the Connecticut wetlands crossings occur within the boundaries of Branford. Branford's wetlands are predominantly

freshwater palustrine, characterized as non-tidal wetlands dominated by trees, shrubs and herbaceous plants.

Pipeline construction plans call for clearing 75 or more feet along the entire length of the pipeline for a permanent right of way easement, and a "temporary" construction area. In many areas along the proposed route, the corridor is bound by ledge, steep side slopes, or other natural obstacles. It is improbable that clearing of a 75-foot wide construction zone is helpful in these instances. Moreover, the pipeline snakes back and forth under the tracks four times in the 3.06 miles of its length in Branford, which maximizes its impact on environmentally sensitive areas.

The DEIS assumes, incorrectly, that there is a difference between a "temporary" disturbance and a long-term disturbance in a wetland system. However, clearcutting of trees and the compaction of soils by heavy machinery cannot be considered "temporary" disturbances. Furthermore, since attaining even a semblance of the preconstruction state will take decades, there should be no distinction between acreage disturbed only during construction and acreage kept cleared after construction.

The primary impact of pipeline construction and right-of-way maintenance activities on wetlands would be the permanent conversion of forested wetland to scrub-shrub or emergent wetlands. As the DEIS acknowledges, in forested and scrub-shrub wetlands, the impact of construction would be of longer duration due to the longer regeneration period of these vegetative types, and clearing of wetland vegetation would result in temporary and permanent loss or alteration of wetland wildlife habitat and some wetland function. Other impacts associated with construction are changes in wetland hydrology, which could result in drier soil conditions which could inhibit the reestablishment of wetland vegetation. Disturbance of wetlands also could affect the wetlands' capacity to control erosion.

The effects of the construction process will permanently alter the nature of the wetlands and watercourses that it traverses even with a properly managed intensive mitigation plan. The cutting of the nearly unbroken canopy of trees over the wetlands, including those that lie along the rail line, will permit new levels of light and heat to penetrate down to the floor of the forested wetlands, changing the biological community of the wetland and subjecting it to drying.

The great majority of inland wetlands along the proposed route exhibit high values and are populated by a preponderance of native vegetation. The opening of the canopy also provides a direct corridor for penetration of invasive species that competes with and displaces local indigenous flora, thereby reducing natural biodiversity.

The proposed pipeline construction clearly constitutes "regulated activity," which would trigger the "no net loss" of wetlands clause.

As the DEIS properly points out, the Federal Clean Water Act of 1989, Section 404 specifies a "no net loss" requirement that wetland disturbances must be mitigated according to an approved wetland mitigation plan that enhances, restores or creates a wetland in an area ratio of not less than twice the area of the proposed wetland disturbance. Branford's Wetlands and Watercourses Regulations section 7.5.5 incorporates the "no net loss" requirement for all wetland disturbances greater than 750 square feet. Branford's "no net loss" requirement is consistent with requirements set by the Department of Environmental Protection for the State of Connecticut under chapter 22a, and by federal government pursuant to the Clean Water Act, section 404. BRC Report, p. 9. Under these definitions, the proposed pipeline construction clearly constitutes "regulated activity," which would trigger the "no net loss" of wetlands clause.

It is troubling that the DEIS does not require a more demanding construction plan. As it is, IE's application includes only generic plans for wetland crossings and construction procedures for work near wetlands. The procedures and diagrams propose possible methods for working in and around wetlands, but do not indicate which procedures would be used in a given instance. This makes it difficult, if not impossible, to estimate the environmental cost of these wetlands losses, and, if approved, would legitimize the "worst case" construction plan.

In addition, the "Erosion and Sedimentation Control Plan" ("E&S Plan") as submitted by IE does not meet Branford's standards. Section 5 of the E&S Plan, dealing with wetlands crossings, allows sidecasting as a method of handling soil removed from a trenching operation in a wetland of intermediate or larger size. Placing spoils in a wetland area amounts to filling a wetland, and is subject to the Section 404 "no net loss" requirement. The E&S Plan also calls for stockpiling of spoils within 10 feet of the wetland boundary in the case of small or intermediate size crossings. A 10-foot buffer is not sufficient to exclude the migration of soil particles and associated phosphates into the wetlands.

IE's plan to allow "natural" revegetation is not a reasonable approach to achieve revegetation of forested wetlands.

In Connecticut, erosion and sedimentation control measures must be designed and approved on a site-specific basis. Branford's Inland Wetlands regulations require a clear and precise wetland planting plan that provides for at least five years of post-construction monitoring. Wetlands that are unavoidably disturbed must be re-vegetated with local wetland species. The IE E&S Plan (p. 1-2), referencing FERC Procedure (Section VI.D.5), states that forested wetlands will be re-vegetated with annual ryegrass.

It will be decades before trees of the size of those being removed (two to four feet diameter, heights of more than 50 feet) will again be present. The DEIS appears to approve the IE construction plan, which proposes to do no restoration of the construction area, other than to scatter some seed of herbaceous species and otherwise let the plants grow from roots and seeds left in place Without active post-disturbance management, a mix of species similar to that present prior to the disturbance rarely occurs. In particular, the combined effects of the initial disturbance and altered light, soil and water conditions that result from the changing of a mature woodland to an immature, early successional community favor the dominance of invasive species.

Furthermore, the seed mixes identified by Islander East contain mostly non-native species, which is unacceptable. No watering plan has been submitted and no contingency plan has been considered should the seed mixes not germinate properly (i.e., using mature plants rather than seeding). Finally, there are no success criteria for the restoration plan. At present, Branford requires an 85% survival rate for a period of no less than five years.

Conditions relating to route selection and construction practices - land

1. Require that Islander East provide maps (of scale not less than 1" equals 40 foot) that show the exact location of wetlands, construction areas, and soil and erosion controls within each construction zone to a suitable regulatory body that includes municipal personnel before starting work at that location.

2. The pipeline should avoid wetland areas unless absolutely no alternative route is available. Directional boring /drilling must be utilized to avoid direct disturbance to and destruction of all wetlands.

3. Islander East should be required to work within as narrow a construction zone as possible, **determined in a site-specific manner.**

4. Require that water for hydrotesting the Branford portion of the pipeline be obtained from municipal water supply sources.

5. An environmental engineering company having its main office in the state of Connecticut should be retained as an **independent environmental inspector** for oversight of pipeline installation on land for a period to include the installation of the pipeline plus an additional five years.

An employee of this company should be required to be present on the construction site at all times.

- The environmental inspector should have formal training and experience in environmental engineering and local soil sedimentation and erosion controls as dictated by the Connecticut DEP's manual, "Guidelines for Soil Erosion and Sedimentation Control".
- The environmental inspector should have sufficient oversight and authority to stop, correct, and modify any and all construction practices that do not meet local standards, or that cause more damage or disruption than is absolutely necessary.
  The responsibilities of the environmental inspector should include:
  - ensuring that all soil sedimentation and erosion controls are in place before any construction activities are undertaken;
  - filing timely weekly reports and a report of any intrusion into wetlands and wetland upland review areas Branford's Inland Wetlands Enforcement Officer;
  - creating a re-vegetation and restoration plan for all disturbed areas using only native species suited to the area, including a plan for mitigating all disturbed wetlands at not less than a 2:1 ratio as per local regulations, to be filed with and reviewed by the Branford Inland Wetland and Watercourses Agency, which would have the authority to request modifications;
  - overseeing the restoration of all disturbed areas, including monitoring for a minimum of 5 years after the last planting to insure a survival rate of 85%.

6. Require that the width of the permanently cleared area within the right of way be kept to the minimum required for monitoring by inspection from the Branford Steam Railroad.

7. Replant all wooded upland and wetland areas used for construction that will not be kept clear for monitoring purposes with native species of trees and shrubs suitable to the site in numbers at least equal to the trees and shrubs that were cut during construction. Trees will be of equal trunk diameter as those removed.

8. Provide a source of income to the Town of Branford and the Branford Land Trust sufficient to pay for yearly removal (not merely cutting) of invasive species (as identified on the list prepared by Connecticut Invasive Plants Working Group, January 2000, as revised) from the right of way and other disturbed areas.

9. Restore all stones in stone walls to their exact pre-construction positions.

HORIZONTAL DIRECTIONAL DRILLING (HDD) AND MARINE INSTALLATION

Shellfish beds that are threatened by the pipeline installation are an important economic resource to individuals and to the Town of Branford. IE proposes horizontal directional drilling for entering Long Island Sound underneath the Town-leased shellfish beds. The proposed length

of the HDD is 4,000 feet, about 500 feet under land and about 3500 feet under the sea floor. 174 acres under Branford's jurisdiction lies beyond the proposed exit point of the HDD.

Horizontal directional drilling is untried in the context proposed here. IE is proposing the longest HDD project in Duke Energy's history and its first attempt at HDD in ocean conditions, starting on land and exiting on the ocean floor. Having the drill exit under water poses extreme technical challenges that Islander's engineers have never faced before. The depth of the exit point is approximately 13 feet below mean low water (19 feet or more below mean high water). Since HDD is performed using a suspension of bentonite clay injected under high pressure into the bore hole to lubricate the drill bit and enhance the cutting efficiency of the drill, a containment structure must be in place where the drill exits the hole to prevent large volumes of the pressurized bentonite slurry from escaping into the water and dispersing in the currents. IE is still designing a containment structure, and could not say how it will contain the Bentonite slurry at the exit point of the drill.

The bentonite clay used for drill lubrication "flocculates" i.e., congeals and falls to the sea floor without dispersion. This claim may be incorrect, since the dispersion of bentonite and for that matter all sediment suspended during the underwater construction phase of the pipeline project depends largely on the salinity levels, pressure, specific gravity and tidal current strength in the area of discharge. Given the low salinity of Stony Creek Harbor that results from the influx of fresh water streams, the potential for dispersion of bentonite and other sediment raises concerns. the chance of failure is increase by the presence of large amounts of granite in the area proposed for HDD.

IE did not prepare a contingency plan for how the pipe will be laid should directional drilling fail. Should the HDD prove to be unable to open the necessary path for the pipe, then the company has two options: move the drill path or fall back to trenching techniques. The first option raises concern, given that movement of the directional drill not only creates a second and/or multiple intrusions into the shellfish beds but would require additional time, produce additional discharge of spoils that would require disposal and raise the potential for unplanned release of bentonite.

IE's expert witness, W. Frank Bohlen, did not present a final analysis of marine sediment dispersion associated with the installation of the IE pipeline. In his Initial Evaluation, Dr. Bohlen stated that 1.4 million cubic yards of sediments will be displaced from the bottom of Long Island Sound during the pipeline construction. Approximately 45,000 cubic yards of those sediments would be sidecast and stored for three or more weeks, in mounds ten feet high adjacent to the pipeline route between MP 10.95 and MP12. Dr. Bohlen has not explained what will happen to those materials under winter conditions, when the sidecast materials are exposed to storm events. In particular:

- Sidecasting and temporary storage of these dredged materials presents a significant risk to water quality and benthic resources Wind generated waves can rapidly reach heights of more than eight feet. Waves this high can completely mobilize the sidecast mounds and transport the dredge spoil throughout the Thimble Islands area.

- Wave-driven dispersion of the temporarily-stored dredge spoils will require IE to import sediments for the burial of the installed pipeline. The Application identifies no contingency for such a requirement and has provided no assessment of the resulting impacts to offshore and coastal resources.

Dr. Bohlen estimates that 5% of the excavated sediments will be released into the water column during mechanical dredging operations as the sidecast mounds are formed between MP 10 and MP 12.5; and that 80% of those suspended sediments will settle within 20 meters of the dredge position. These claims are not supported by any field observations or simulations of hydrodynamic events, nor has there been produced any defensible quantification of the impacts caused by dredging and sidecasting sediments in this area.

Material removed by drilling, together with the spent bentonite slurry, will be collected in a small impoundment pool, where the bentonite will be separated from the drill spoil for reuse. It is not known whether the pools would reliably impound the discharged material from the drill, nor is there any information about the impact on the salt marshes should the spent slurry escape.

Conditions relating to route selection and construction practices – marine

1. Retain a **second, independent, environmental engineering firm** with expertise in marine construction to provide independent oversight of the horizontal directional drilling and installation of the marine portion of the pipeline, with sufficient oversight and authority to stop, correct, and modify any and all construction practices that cause more damage or disruption than is absolutely necessary.

2. Provide quantification of sediment-related impacts that will result from the proposed mechanical plow operations and commit to the use of the mechanical plow for all offshore operations. The hydraulic plow should not be permitted for use on this project.

3. Provide a plan that addresses how the pipeline placed by HDD would be repaired and/or maintained.

4. Prohibit construction on any part of the project, neither in the upland nor the marine areas from commencing unless and until IE has successfully completed a satisfactory bore hole by the HDD process, as certified by an independent engineer. However, after two

unsuccessful attempts at completing a bore hole have been made, without success, IE shall so notify the FERC and must halt construction until further notice.

5. Test marine sediments at close intervals along the route for heavy metals and other toxic materials. The route should be altered to avoid areas where levels of toxic materials exceed background.

6. Develop a mitigation and restoration plan for all marine activities that will return the impacted area to preconstruction conditions within one year. This plan must be approved by National Marine Fisheries Service, Connecticut Department of Environmental Protection and the Branford Shellfish Commission.

ALTERNATIVES

The DEIS section on alternative routes (Section 4) is a valuable starting point. Given a review of the facts summarized below, it is clear that the proposed alternative to the Islander East pipeline by the Iroquois Gas Transmission Company ("Iroquois") offers a solution to Long Island's energy needs that will be easier to install, minimizes impacts to both upland and offshore environments, and has its ultimate capacity determined by prevailing market forces on Long Island.

However, as an option, Branford proposes a variation of the alternatives presented, namely a joint venture between IE and Iroquios. This proposal requires:

- That the Iroquois system proposal be accepted as the means of supplying natural gas to Long Island but that Iroquois control only its present system and benefit from its upgrades and increased volumes, and
- That Islander East build, be responsible for and benefit from the extension across the sound and its gas volumes into Long Island.

Because these are two competing companies, this relationship may have to be implemented by FERC. However, under this alternative, gas could be provided to Long Island at the correct pressures in the shortest possible time; both of these competing companies would profit (although each to a lesser extent); the significant environmental impact to Connecticut, the Sound and Long Island would be minimized; the size of the system would be determined by market demand; and last but not least, the sound public policy concept of avoiding cumulative impacts would be furthered.

The Iroquois extension minimizes impact to Long Island Sound by having a route that is approximately 3 miles shorter than the IE proposed line, and by impacting only 25% of one

commercial fishing lease along its entire route. Because of its simplicity, the Iroquois proposal could be completed and in place in a much shorter time frame.

Because of its existing capacity, the Iroquois proposal could meet its evaluation of Long Island's needs without affecting upland or coastal resources. (One compressor station will be required on land already owned bordering a closed landfill.) Should Long Island's energy needs change, the Iroquois system could be upgraded to meet the needs projected by IE with a simple 6.5 mi loop that could be installed anywhere along the existing Iroquois upland route. This is far less upland impact than IE proposes for the same supply.

The existing Iroquois upland system is a far safer system than the one IE proposes to build. It is a class 3 system with a higher wall-strength than IE's proposed system, and additionally, it is encased in concrete to ensure safety. It is also pressure-tested to 2200 psi. A system of this type is generally considered impenetrable by the trade. IE's system is not.

Utilizing the Iroquois alternative, therefore, nullifies the needs-analysis argument between the two companies. Current needs can be met immediately with minimal environmental impact. Actual market demand can then effectively regulate upgrading the system. This is FERC's stated preference and in fact ensures that the environmental impact will be limited to only what is necessary. (There is ample lead-time in evaluating need as it develops because of the permitting process for power plants.)

Impact on the New York Side is also minimized by the Iroquois extension, because the IE system could not supply gas at pressures required by power plants. The Iroquois System is a higher pressure system (700 psi to Long Island) than that proposed by IE (366 psi to Long Island). Power plants on Long Island will require between 550 and 600 psi guaranteed continuous pressure. Compressor stations would have to be built on Long Island, as power plants will be principal users of the gas. Compressor stations on Long Island are not necessary under the Iroquois plan.

Branford appreciates the opportunity to respond and respectfully requests that its proposals be incorporated into the finished report.

Very truly yours,

Elizabeth P. Gilson
cc: All parties of record

Subject: **Islander East Pipeline Proposal**
Resent-From: Islandereast.Comments@noaa.gov
Date: Thu, 20 Nov 2003 11:02:49 -0500
From: "Charley Johnson" <CJohnson@transpro.com>
To: <IslanderEast.comments@noaa.gov>
CC: <chastogo1@comcast.net>

Dear NOAA Personnel,

As a concerned citizen of the Pine Orchard section of Branford, Connecticut and the President of the Juniper Point Association Board of Directors I am writing to encourage your support for the Connecticut DEP in opposing the Islander East pipeline proposal. The Juniper Point community consists of homes located in an area bordering the proposed pipeline, which is to be potentially sited in one of the most scenic and environmentally sensitive areas of the Shoreline.. Our strong opposition to this is based in several points:

* Safety of our residents... we have great concerns about the addition of a high pressure, high flow gas pipeline so close to our homes, and located near or under an active railroad. We clearly did not bargain for this addition to our neighborhood when we located in this beautiful area.
* The area involved is both beautiful and a treasure to our Nation, with well known nature trails, fishing grounds, shellfish beds, and a variety of wildlife making their home there. This proposed pipeline will cause irreparable damage to this ecosystem. In addition the Stony Creek area of Branford which is next door to Juniper Point, is an important tourist destination for our region with the famous Thimble Islands just off shore. This area is simply too important to destroy with the Islander pipeline.
* Islander East, by their well know actions, has not shown itself worthy of our trust as a steward of the resources it wishes to utilize, including our lands. We would be placing our lives and those of our children in the hands of this company, and this is simply not a viable situation for us.
* The alternative sites suggested for the pipeline may as well have been through the "State Capitol" given the potential viability of their selection. They were no more than "false alternatives" in order to support Islander East's desires for its route. This is yet another example of Islander's unfortunate approach to this project. There are clearly other alternative including utilization of existing easements which would provide a far superior outcome.

Please help us preserve our community and its valuable heritage and turn down the pipeline proposal.

Sincerely Yours,
Charles E. Johnson
President, Juniper Point Association
2 Juniper Point Road
Branford, Ct. 06405

Subject: **Islander East Appeal**
Resent-From: Islandereast.Comments@noaa.gov
Date: Thu, 20 Nov 2003 11:05:39 -0500
From: RGincavage@globalp.com
To: IslanderEast.comments@noaa.gov

Gentlemen

Islander East has picked the most environmentally sensitive area in Connecticut to cross Long Island Sound. Irreversible environmental damage will be done to the Sound which is one of Connecticut's most valuable resources. The damage would negatively affect generations to come. Please do not allow this to happen.

Please support the Connecticut Department of Environmental Protection and deny Islander East's appeal. There is an alternative route that would not put our environment at as much risk.

Sincerely,
Ray Gincavage
11 Whiting Farm Road
Branford, CT 06405

Subject: **Please deny IE appeal**
Resent-From: Islandereast.Comments@noaa.gov
Date: Thu, 20 Nov 2003 11:41:34 -0500
From: Bob Crelin <bcrelin@rcn.com>
To: <IslanderEast.comments@noaa.gov>

Dear NOAA,

Please support our CT DEP and deny Islander East's appeal

Thanks,

Bob Crelin